UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WASHINGTON AT SEATTLE

The Honorable Robert S. Lasnik

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STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
THORACIC SURGERY DIRECTORS
ASSOCIATION TO FILE RESPONSIVE
PLEADING (2:18-cv-00090-RSL)

JEREMY CONKLIN, D.O., an individual,

UNIVERSITY OF WASHINGTON

OF WASHINGTON SCHOOL OF

MEDICINE, a Washington public health

WASHINGTON MEDICAL CENTER, a

Washington public hospital; UNIVERSITY

official capacity and individually; LESTER PERMUT, M.D., in his official capacity and

MEDICAL GROUP, a Washington pediatric group; MARY BRIDGE CHILDREN'S

FOUNDATION, a Washington public benefit

individually; SEATTLE CHILDREN'S

HOSPITAL, a Washington non-profit corporation; CHILDREN'S UNIVERSITY

corporation; AMERICAN BOARD OF

non-profit corporation; THORACIC

INC., a North Carolina non-profit corporation; and ACCREDITATION

THORACIC SURGERY, INC., an Illinois

SURGERY DIRECTORS ASSOCIATION,

COUNCIL FOR GRADUATE MEDICAL

MEDICINE, a Washington public educational institution; PAUL RAMSEY, M.D., in his

system; UW MEDICINE/NW, a Washington

public benefit corporation; UNIVERSITY OF

VS.

Plaintiff.

NO. 2:18-cv-00090-RSL

STIPULATION AND [PROPOSED]—ORDER EXTENDING TIME FOR DEFENDANT THORACIC SURGERY DIRECTORS ASSOCIATION, INC. TO FILE RESPONSIVE PLEADING

NOTE ON MOTION CALENDAR: February 23, 2018

Betts Patterson Mines One Convention Place Suite 1400 701 Pike Street Seattle, Washington 98101-3927

Stipulation and [Proposed] Order Extending Time for Defendant Thoracic Surgery Directors Association, Inc. to File Responsive Pleading.docx/022318 1631/9998-0043

EDUCATION, an Illinois non-profit 1 corporation, 2 Defendants. 3 Defendant Thoracic Surgery Directors Association, Inc. ("TSDA") and Plaintiff Jeremy 4 Conklin, D.O., by and through their counsel of record, hereby stipulate and agree that the 5 deadline for Defendant TSDA to file a responsive pleading be extended to April 2, 2018 and 6 request that the Court enter the proposed order consistent with this stipulation. 7 8 Respectfully submitted this 23rd day of Respectfully submitted this 23rd day of February, 2018. February, 2018. 9 HKM EMPLOYMENT ATTORNEYS, LLP BETTS, PATTERSON & MINES, P.S. 10 By/s/Kristi Favard [per email authorization] 11 By/s/James D. Nelson Kristi Favard, WSBA #34419 By/s/Shaina R. Johnson 12 HKM Employment Attorneys, LLP By/s/Natalie A. Moore 600 Stewart Street, Ste. 901 James D. Nelson, WSBA #11134 13 Seattle, WA 98101 Shaina R. Johnson, WSBA #46079 (206) 838-2504 Tel.: Natalie A. Moore, WSBA #45333 14 Fax: (206) 260-3055 Betts, Patterson & Mines P.S. E-mail: kfavard@hkm.com One Convention Place, Suite 1400 15 Attorneys for Plaintiff 701 Pike Street 16 Seattle, WA 98101-3927 Tel.: (206) 292-9988 17 Fax: (206) 343-7053 E-mail: jnelson@bpmlaw.com 18 E-mail: sjohnson@bpmlaw.com E-mail: nmoore@bpmlaw.com 19 Attorneys for Defendant Thoracic Surgery 20 Directors Association, Inc. 21 22 23 24 25 **Betts** STIPULATION AND (PROPOSED) Patterson ORDER EXTENDING TIME FOR Mines THORACIC SURGERY DIRECTORS One Convention Place

(206) 292-9988
Stipulation and Proposed Order Extending Time for Defendant Thoracic Surgery Directors Association, Inc. to File Responsive Pleading.docx/022318 1631/9998-0043

ASSOCIATION TO FILE RESPONSIVE

PLEADING (2:18-cv-00090-RSL)

Suite 1400

701 Pike Street

Seattle, Washington 98101-3927

1 **ORDER** 2 IT IS SO ORDERED. DATED this 3 4 5 6 Lodged by: 7 BETTS, PATTERSON & MINES, P.S. 8 By/s/James D. Nelson By/s/Shaina R. Johnson By/s/Natalie A. Moore James D. Nelson, WSBA #11134 10 Shaina R. Johnson, WSBA #46079 11 Natalie A. Moore, WSBA #45333 Betts, Patterson & Mines P.S. 12 One Convention Place, Suite 1400 701 Pike Street 13 Seattle, WA 98101-3927 14 Telephone: (206) 292-9988 Facsimile: (206) 343-7053 15 E-mail: jnelson@bpmlaw.com E-mail: sjohnson@bpmlaw.com 16 E-mail: nmoore@bpmlaw.com Attorneys for Defendant Thoracic Surgery 17 Directors Association, Inc. 18 Approved for entry by: 19 HKM EMPLOYMENT ATTORNEYS, LLP 20 By/s/Kristi Favard [per email authorization] Kristi Favard, WSBA #34419 21 HKM Employment Attorneys, LLP 22 600 Stewart Street, Ste. 901 Seattle, WA 98101 23 Tel.: (206) 838-2504 Fax: (206) 260-3055 E-mail: kfavard@hkm.com Attorneys for Plaintiff 25 Betts STIPULATION AND [PROPOSED] Patterson ORDER EXTENDING TIME FOR Mines THORACIC SURGERY DIRECTORS One Convention Place Suite 1400 ASSOCIATION TO FILE RESPONSIVE 701 Pike Street PLEADING (2:18-cv-00090-RSL) Seattle, Washington 98101-3927 Stipulation and Proposed Order Extending Time for Defendant Thoracic Surgery Directors Association, Inc. to File Responsive Pleading.docx/022318 1631/9998-